



2. Plaintiff Zina V. Lain is citizen and resident of the State of Illinois. Ex. A, Cplt. filed 2/08/2021, Count I, ¶ 1.

3. Caesars Holdings, Inc. f/k/a Caesars Entertainment Corporation is a corporation with a single shareholder, Caesars Entertainment, Inc. (BlackRock, Inc. owns more than 10% of the stock issued by Caesars Entertainment, Inc.)

4. Caesars Holdings, Inc. is corporation organized in Delaware with a principal place of business in Nevada.

5. Caesars Entertainment, Inc. is a corporation organized in Delaware with a principal place of business in Nevada.

6. CEOC, LLC f/k/a Caesars Entertainment Operating Company, Inc. is a limited liability company with a single member, Caesars Resort Collection, LLC.

7. Caesars Resort Collection, LLC is a limited liability company with a single member, Caesars Growth Partners, LLC.

8. Caesars Growth Partners, LLC is a limited liability company with a single member, Caesars Holdings, Inc. f/k/a Caesars Entertainment Corporation (see #6-8 above).

9. Des Plaines Development L.P. is a limited partnership with two partners, Des Plaines Development Holdings, LLC and Harrah's Illinois LLC.

10. Des Plaines Development Holdings, LLC is a limited liability company with a single member, Jonathan Eilian, who is a citizen of the State of New York.

11. Harrah's Illinois LLC f/k/a Harrah's Illinois Corporation is a limited liability company with a single member, CEOC, LLC f/k/a Caesars Entertainment Operating Company, Inc. (see 6-8 above).

12. Harrah's Joliet Landco LLC has not been served; however should that occur, its citizenship is as follows: Harrah's Joliet LandCo LLC is a limited liability company with two members, Des Plaines Development Holdings, LLC (see #10 above) and VICI Properties 1 LLC.

13. VICI Properties 1 LLC is a limited liability company with a single member, VICI Properties L.P.

14. VICI Properties L.P. is a limited partnership with two partners, VICI Properties Inc. and VICI Properties GP LLC.

15. VICI Properties GP LLC is a limited liability company with a single member VICI Properties Inc.

16. VICI Properties Inc. is organized in Maryland with a principal place of business in New York.

17. The Vanguard Group, Inc. (through twenty-five funds) and Cohen & Steers Capital Management, Inc. (though 28 funds) each own more than 10% of the stock issued by VICI Properties Inc.

18. Schindler Elevator Corporation is a wholly owned subsidiary of Schindler Enterprises, Inc.

19. Schindler Elevator Corporation is a Delaware Corporation with its principal place of business in New Jersey.

20. Schindler Enterprises, Inc. is a Delaware Corporation with its principal place of business in New Jersey.

21. Accordingly, there is complete diversity among the parties.

**b. Amount in Controversy**

22. The amount-in-controversy requirement for diversity jurisdiction is satisfied.

23. Plaintiff's itemized damages produced in discovery exceed \$77,000.

**c. Other Prerequisites for Removal have Been Satisfied**

24. No defendant is a citizen of the State of Illinois. *See* 28 U.S.C. 1441(b) and *Hertz v. Friend*, 59 U.S. 77 (2010)(adopting 7th Circuit "nerve center" test).

25. Harrah's and CEOC filed their appearance on 3/24/2021.

26. Schindler filed its appearance on 3/25/2021.

27. Plaintiff served her answers to written discovery on 10/06/2021 which included itemized medical bills which allegedly support her injuries.

28. Plaintiff's medical bills total over \$77,000; service of her medical bills was the first instance where defendants learned the case value.

29. This Removal Petition was filed within 30 days (11/05/2021) of defendants' notice of case value in excess of \$75,000.

30. Consequently, this Notice of Removal is timely filed pursuant to 28 U.S.C. Section 1446(B)(3).

31. The Circuit Court of Cook County is located within the Northern District of Illinois, Eastern, Division. 28 U.S.C. Section 93(a)(1).

32. Copies of all process, pleadings, and orders served upon removing entities are attached as Exhibit A.

**WHEREFORE**, defendants Harrah's Joliet Casino Hotel a/k/a Harrah's Illinois LLC and of Caesars Entertainment Operating Company, Inc. and defendant Schindler Elevator Corporation, hereby remove to this Court the state-court action entitled *Zina V. Lain v. Schindler Enterprises et al.*, Civil Action No. 2021 L 001448.

Respectfully submitted:

<p>/s/Frank Kasbohm</p> <p>Attorney for Defendants Harrah's Joliet Casino Hotel a/k/a Harrah's Illinois LLC and Caesars Entertainment Operating Company, Inc.</p>	<p>/s/Thomas Tomasik Robert Larsen</p> <p>Attorney for Defendant Schindler Elevator Corporation</p>
<p>Feiereisel &amp; Kasbohm, LLC 218 North Jefferson Suite 300 Chicago, Illinois 60661 <a href="mailto:fkasbohm@fkllc.net">fkasbohm@fkllc.net</a> ARDC #: 6181770 Phone: 312-361-1941 Fax: 312-782-4537</p>	<p>Cunningham, Meyer &amp; Vedrine, P.C. 4200 Cantera Dr., Suite 112 Warrenville, IL 60555 Office Phone: 630/260-8607 Fax: 630/260-8080 <a href="mailto:ttomasik@cmvlaw.com">ttomasik@cmvlaw.com</a> <a href="mailto:rlarsen@CMVLaw.com">rlarsen@CMVLaw.com</a></p>